

EXHIBIT A

Dolan, William F.

From: Hoffmann, Mathew W.
Sent: Friday, October 11, 2019 10:32 AM
To: Stephen Klein
Cc: Hazzard, Michael B.; Rossum, Ann T.; Thakur, Jenice; Edmonds, Kim N.; Steven Woodrow; Taylor Smith; aaron@aftergoodesq.com; Patrick Peluso
Subject: RE: Wigod v. CallFire, Case No. 2:19-cv-02874-SVW-MAA - Mediation

Stephen,

Thank you for scheduling the mediation on October 30 with Judge Anderson.

CallFire intends to take the deposition of Ms. Lori Wigod. We propose to hold a meet and confer regarding your proposed motion to quash on Tuesday, October 15 at 2 PM Eastern.

In response to your L.R. 37-1 letter of October 9, we propose to hold a meet and confer on Thursday, October 17 at 2 PM Eastern.

Regards,

Mathew

Mathew W. Hoffmann
Associate
JONES DAY® - One Firm WorldwideSM
51 Louisiana Avenue NW
Washington, D.C. 20001
Office +1.202.879.3447

From: Stephen Klein <sklein@woodrowpeluso.com>
Sent: Thursday, October 10, 2019 5:53 PM
To: Hazzard, Michael B. <mhazzard@jonesday.com>
Cc: Hoffmann, Mathew W. <mhoffmann@jonesday.com>; Rossum, Ann T. <atrossum@jonesday.com>; Thakur, Jenice <jthakur@jonesday.com>; Edmonds, Kim N. <knedmonds@JonesDay.com>; Steven Woodrow <swoodrow@woodrowpeluso.com>; Taylor Smith <tsmith@woodrowpeluso.com>; aaron@aftergoodesq.com; Patrick Peluso <ppeluso@woodrowpeluso.com>
Subject: Re: Wigod v. CallFire, Case No. 2:19-cv-02874-SVW-MAA - Mediation

Hi Mike,

We agree to hold the mediation with Judge Anderson on 10/30. I will reach out to Judge Anderson's office to reserve that date.

We also agree to hold Lee Wigod's deposition on 10/29, but we do not agree to the deposition of Lori Wigod on 10/28. We are generally opposed to any deposition of Lori Wigod, as she does not possess any knowledge relevant to this case. If you are insistent on pursuing a deposition, we intend to file a motion to quash any subpoena to that effect. Before we do, please let us know when you can meet and confer. As our deadline to move to quash is rather short, please advise ASAP.

Best regards,
Stephen

On Wed, Oct 9, 2019 at 2:39 PM Hazzard, Michael B. <mhazzard@jonesday.com> wrote:

Thank you, Stephen.

Would the following work for you:

10/28, Lori Wigod deposition

10/29, Lee Wigod deposition

10/30, Mediation with Judge Anderson

Sincerely,

Mike

From: Stephen Klein <sklein@woodrowpeluso.com>

Sent: Wednesday, October 9, 2019 4:19 PM

To: Hazzard, Michael B. <mhazzard@jonesday.com>

Cc: Hoffmann, Mathew W. <mhoffmann@jonesday.com>; Rossum, Ann T. <atrossum@jonesday.com>; Thakur, Jenice <jthakur@jonesday.com>; Edmonds, Kim N. <knedmonds@JonesDay.com>; Steven Woodrow <swoodrow@woodrowpeluso.com>; Taylor Smith <tsmith@woodrowpeluso.com>; aaron@aftergoodesq.com

Subject: Re: Wigod v. CallFire, Case No. 2:19-cv-02874-SVW-MAA - Mediation

Hi Mike,

I've reached out to the mediators to check for availability; please see the email below. It looks like Judge Anderson is available on 10/30 and 10/31, but we have a conflict on 10/31. Would you be open to holding the deposition on the 10/29 and holding the mediation the following day, 10/30?

Let us know your thoughts.